

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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ROBIN JOACHIM DARTELL, et al.,
Individually and on Behalf of All Others
Similarly Situated

Plaintiff,

vs.

TIBET PHARMACEUTICALS, INC., et al

Defendant.

: Civil Action No. 14-CV-3620-MCA-
: MAH

: CLASS ACTION

: **NOTICE OF PLAINTIFFS'**
: **MOTION TO ENTER DEFAULT**
: **JUDGMENT AGAINST**
: **DEFENDANT TIBET**
: **PHARMACEUTICALS, INC.**

: **February 20, 2018**
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PLEASE TAKE NOTICE that on February 20, 2018 or as soon as the matter may be heard before the Honorable John Michael Vasquez, United States District Judge, at the Martin Luther King Building & U.S. Courthouse, Courtroom PO 03, 50 Walnut Street, Newark, NJ 07101, Plaintiffs will move the Court for an Order, pursuant to Rule 55(b) of the Federal Rules of Civil Procedure, entering a default judgment against Defendant Tibet Pharmaceuticals, Inc.

This Motion is based upon the accompanying Memorandum of Law and the Declaration of Laurence Rosen and exhibits, dated January 18, 2018 filed herewith.

Dated: January 18, 2018
Newark, New Jersey

THE ROSEN LAW FIRM, P.A.

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Lead Counsel for Plaintiffs and the Class

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT ON THIS 18th day of January 2018, a true and correct copy of: the Notice of Plaintiffs' Motion to Enter Default Judgment Against Defendant Tibet Pharmaceuticals, Inc.; Memorandum of Law in Support thereof; Declaration of Laurence Rosen in support thereof and exhibits thereto, was served by CM/EFC to the parties registered to the Court's CM/ECF system.

/s/ Sara E. Fuks